

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WADLEY PIERRE,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE, MARTIN BESLIN,
and RICHARD SPINGEL,

Defendants.

C.A. No. 13-12055-MLW

JURY DEMAND

**UNOPPOSED MOTION BY PLAINTIFF TO EXTEND TIME TO RESPOND TO
DEFENDANTS' PARTIAL MOTION TO DISMISS**

Plaintiff Wadley Pierre hereby moves this Court, without opposition from Defendants, for an extension of time to respond to Defendants' partial motion to dismiss due to the need to retain new counsel. As grounds for this motion, Plaintiff states as follows:

1. The Defendants filed a partial motion to dismiss Plaintiff's First Amended Complaint on October 29, 2013. A response is due on November 12, 2013.
2. Beginning a few weeks before the filing of the motion, Plaintiff's relationship with his counsel began to breakdown. Today, November 8, 2013, Plaintiff and his counsel decided that Plaintiff should retain new representation.
3. Due to the developing breakdown in the attorney-client relationship, Plaintiff's counsel did not begin working on responding to the Defendants' partial motion to dismiss as he felt doing so would be inappropriate and possibly unethical. *See* Affidavit of Joseph L. Sulman, Esq., attached hereto as Exhibit A.

4. Accordingly, Plaintiff requests an extension of time to respond to the Defendants' motion until the earlier of: a) fourteen days after he retains new counsel, or b) sixty days from the granting of this motion.

5. Defendants' counsel has informed Plaintiff's counsel that Defendants do not oppose this request.

WHEREFORE, Plaintiff moves this Court, without opposition from Defendants, for an extension of time to respond to Defendants' partial motion to dismiss to the earlier of: a) fourteen (14) days after retention of new counsel or b) sixty days from the date that this motion is granted.

Respectfully submitted,

PLAINTIFF WADLEY PIERRE,

By his attorneys,

/s/ Joseph Sulman
Joseph L. Sulman, BBO #663635
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185 Devonshire Street, Suite 502
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November 8, 2013

CERTIFICATE OF SERVICE

I hereby certify that I served this document on all counsel of record by ECF on November 8, 2013.

/s/ Joseph Sulman
Joseph L. Sulman